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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

SHANE SIPE, an individual,

Plaintiff,

v.

MUSIC TRIBE COMMERCIAL NV INC.;
DOES I through X, inclusive; ROE
CORPORATIONS I through X, inclusive,

Defendant.

Case No.: 2:20-cv-00299-JCM-BNW

**STIPULATION AND
ORDER TO EXTEND TIME FOR
PLAINTIFF TO RESPOND TO
DEFENDANT'S MOTION FOR
SUMMARY JUDGMENT
(Third Request)**

Plaintiff Shane Sipe (hereinafter "Sipe") and Defendant Music Tribe Commercial NV Inc. (hereinafter "Defendant") by and through their respective counsel of record, do hereby stipulate and agree to a further extension of time for Plaintiff to respond to Defendant's Motion for Summary Judgment (Doc #24) from February 1, 2021 up to and including February 12, 2021.

This request is submitted pursuant to LR IA 6-1, 6-2 and LR II 7-1 and 26-4 and is the parties' third request for an extension of the time to respond to this motion. The first extension was agreed via stipulation and submitted December 22, 2020 (Doc #25) based on the disruption of the holidays and COVID-19 related office closures. The first extension was granted on December 28, 2020 (Doc #26) and extending the original deadline for Plaintiff to respond from January 7, 2021 to January 15, 2021.

On January 4, 2021, prior counsel for Plaintiff filed a motion to withdraw (Doc #27) which was granted on January 11, 2021 (Doc #29) and a notice of appearance was subsequently filed by undersigned counsel on January 12, 2021 (Doc #31). Thereafter, Plaintiff filed a Motion

1 for a two-week extension up until January 29, 2021, (Doc #32) (Second Request) to allow new
2 counsel additional time to get up to speed, which the Court granted January 22, 2021. (Doc #34)

3 This third request arises from the complexity of the record in this FLSA overtime and
4 wrongful termination action and the unexpected confluence of several expedited matters in
5 Plaintiff's counsel's other cases late January.

6 This extension is requested pursuant to an agreement between counsel.

7 Accordingly, Plaintiff's shall have up to and including February 12, 2021 to respond to
8 Defendant's Motion to for Summary Judgment.

9 Dated this 3rd day of February 2021.

Dated this 3rd day of February 2021.

10 IRELAND LAW GROUP, LLC

HUTCHINGS LAW GROUP, LLC

11 By: /s/Amanda L. Ireland

By: /s/ Mark H. Hutchings

12 Amanda L. Ireland, Esq.

Mark H. Hutchings, Esq. (SBN 12783)

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Attorney for Plaintiff Shane Sipe

Attorney for Defendant Music Tribe

Commercial NV Inc.

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22 **IT IS SO ORDERED:**

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25 **UNITED STATES DISTRICT JUDGE**

26 **Dated:** February 5, 2021.
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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on the 4th day of February 2021, I electronically filed the foregoing **STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT** via Electronic Filing/Service Notification through CM/ECF to:

ATTORNEY OF RECORD	TELEPHONE/FAX	PARTIES
Mark H. Hutchings, Esq. HUTCHINGS LAW GROUP, LLC 552 E. Charleston Blvd. Las Vegas, Nevada 89104 MHutchings@HutchingsLawGroup.com	Tel: (702) 660-7700 Fax: (702) 552-5202	Defendant <i>Music Tribe</i> <i>Commercial NV Inc.</i>

/s/ Anya Karakozov

An employee of IRELAND LAW GROUP